REMARKS/ARGUMENTS

1. In the office action dated June 3, 2003 issued on the parent application (09/693,644 , claims 1 to 5 were rejected under 35 U.S.C. 102 (b) as being anticipated by Cowger et al (US 5,565,900).

2. With respect, Applicant believes the claims to be novel and inventive in light of Cowger as Applicant contends that Cowger does not teach all the features recited in those claims that were rejected in the parent application. Specifically, Cowger does not teach or suggest a structure having complementary locating formations configured so that expansion of the printhead module relative to the receiving member is accommodated. However, Applicant has amended the base claim to more explicitly recite the limitations that Applicant believes distinguishes the present invention over Cowger.

3. In particular, claim 1 has been amended to more explicity define a structure that accommodates thermal expansion of the printhead module.

4. Specifically, claim 1 has been amended to recite the limitation that the receiving member and the printhead module comprises a first pair of complementary location formations including a projection and an extended recess adapted to slidably receive the projection, thereby accommodating longitudinal expansion of the printhead module relative to the receiving member. Basis for these amendments can be found throughout the original disclosure, most notably page 6 lines 20 to 25 and page 7 lines 4 to 6.

5. In addition, in claim 9 there is presented the limitation that the recesses are triangular when viewed in cross section normal to the longitudinal axis. Basis for this claim can be found at page 6, lines 23 to 25 and Figures 6 and 12 of the original disclosure. This construction facilitates expansion in the vertical direction as discussed at page 7 lines 13 to 15 of the original disclosure

6. Further still, in claim 12 there is presented the limitation that the printhead module has a width less than the spacing of the opposed walls between which the printhead module is received and that a third projection urges the printhead module toward first and second location formations. As described at page 7, lines 9 to 13, this arrangement facilitates lateral expansion of the printhead module.

7. Applicant contends that the invention as defined in present claim 1 and the dependent claims is neither taught nor suggested by Cowger.

8. Cowger teaches a unit print head assembly for ink-jet printing. As illustrated by the Examiner, Cowger teaches an elongate receiving member 24, termed the pen body. Received in the pen body 24 is an elongate printhead module 22 referred to in Cowger as a unit print head assembly. The assemblies 22 are received between opposed walls 104, 106 of the pen body. In the main embodiment, the assemblies are secured in place in the pen body by four threaded fasteners 23 that pass through the pen body to be received in complementary threaded bosses 47 formed in the assembly. When assembled, "the assembly is held firmly against the pen body" (see column 5, lines 34 to 35). In an alternative embodiment described at column 5, lines 39 to 48, the pen body includes resilient lips that allow the assembly to be snap-fitted

into the pen body. The pen body lips resile to "firmly hold the assembly in place against the pen body".

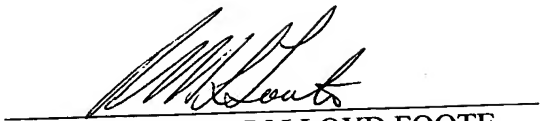
9. In none of the embodiments described in Cowger is it disclosed or suggested that the assembly is received in the pen body in a manner to accommodate relative expansion between the assembly and the pen body. In contrast, the specification teaches holding the assembly firmly against the pen body.

10. Specifically, neither embodiment discloses a pair of complementary location formations comprised of a projection and a recess, the recess being extended so as to slidably receive the projection therein. The four threaded fasteners 23 and threaded bosses 47 used to secure the assembly to the pen body will provide no allowance for expansion of the assembly relative to the pen body in any of the longitudinal, lateral or vertical directions.

11. In light of the amendments and the comments above, Applicant respectfully submits that the claims herein presented are novel and inventive over Cowger and the other prior art of record. Applicant therefore respectfully requests favourable consideration of the application in due course.

Very respectfully,

Applicant:



ROGER MERVYN LLOYD FOOTE

TOBIN ALLEN KING

GARRY RAYMOND JACKSON

KIA SILVERBROOK

C/o: Silverbrook Research Pty Ltd
393 Darling Street
Balmain NSW 2041, Australia

Email: kia.silverbrook@silverbrookresearch.com

Telephone: +612 9818 6633

Facsimile: +61 2 9818 6711